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December 12, 2022

VIA ECF:

Honorable Nina R. Morrison
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Bahl v. NYIT*, Civil Case No. 14-4020
Extraordinary Motion for Extension of Time for Response

Dear Judge Morrison:

Pursuant to your individual practice rules, counsel for Plaintiff writes to you to request a 16-day extension of time to file his Response to Defendant's Motion for Summary Judgment, from December 14, 2022 to December 30, 2022

Our office, including the principal attorney working on this matter almost full-time, Richard Soto, has been hit by a wave of COVID. Three of our five attorneys are out, as is our only secretary and our paralegal. As the Court knows, the record in this matter is extensive; for example, there are 1400 pages of deposition testimony. It is not possible for the two attorneys who are left to take over Mr. Soto's work.

I do expect/hope that Mr. Soto will be back by the 19th and that he can work at home later this week.

I have not conferred with counsel for Defendant because I wanted to get this request in as soon as I heard about Mr. Soto's illness. Given their opposition to our last request, I expect that they will oppose this one.



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Counsel for Plaintiff believes they have made the requisite showing of good cause and respectfully request that their letter motion be granted.

Respectfully submitted,

ADVOCATES FOR JUSTICE,
CHARTERED ATTORNEYS
Attorneys for Plaintiff

/s/ Arthur Schwartz
Arthur Schwartz

cc: Counsel for Defendant (via ECF notification)